

EXHIBIT D

Saad, Lindsey M.

From: Saad, Lindsey M.
Sent: Wednesday, January 10, 2018 3:14 PM
To: 'David Sims'
Subject: RE: Harris v. Q&A

David,

I'm sorry to hear that and hope that you get only good news. Would you please provide some alternative dates that you and Plaintiff Friedrichs, Kathy, and Emily are available for deposition? Thank you.

Lindsey M. Saad

Flaherty

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From: David Sims [<mailto:david.sims@mywvlawyer.com>]
Sent: Wednesday, January 10, 2018 3:11 PM
To: Saad, Lindsey M.
Subject: RE: Harris v. Q&A

Lindsey. I just learned that I must have a biopsy done on January 15 at 9:00 a.m. at WVU on some glands in my neck that day.

From: Saad, Lindsey M. [<mailto:LSaad@flahertylegal.com>]
Sent: Wednesday, January 10, 2018 3:07 PM
To: David Sims <david.sims@mywvlawyer.com>
Subject: Harris v. Q&A

David,

I have not heard from you regarding the Plaintiff's availability on January 15. Please let me know by the end of today. Thank you.

Lindsey M. Saad

Member

Flaherty

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Saad, Lindsey M.

From: Saad, Lindsey M.
Sent: Friday, January 26, 2018 11:22 AM
To: 'David Sims'
Subject: RE:

Hi David,

I had some cancellations next week and my schedule has opened for the end of the week. I am also free Feb. 6-9. Please let me know if the Harrises are available for depositions on any of those dates. I am agreeable to extend the discovery deadline until February 21 to allow us to get some depositions accomplished. Please let me know if you are also agreeable to the same and I will prepare a stipulation.

I will also get you some dates for the Defendants. If we need to take depositions in the evening or weekends, I will try to make my schedule work to do so. Thanks.

Lindsey M. Saad

Flaherty

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From: David Sims [<mailto:david.sims@mywvlawyer.com>]
Sent: Tuesday, January 16, 2018 8:57 AM
To: Saad, Lindsey M.
Subject:

Good morning Lindsey:

Will January 25 work for you to depose the Harrises? I have depositions in Pittsburgh that day, but if that day works, I can reschedule them. Have you had any luck with your clients and dates? I want to depose the named defendants.

David

David A. Sims
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